

Neil N. Olsen, OSB No. 053378
nolsen@zrlawgroup.com
Joseph W. Carlisle, OSB No. 152602
jcarlisle@zrlawgroup.com
ZUPANCIC RATHBONE LAW GROUP, P.C.
4949 Meadows Road, Suite 600
Lake Oswego, OR 97035
Telephone: 503-968-8200
Facsimile: 503-968-8017

Of Attorneys for Plaintiff
Copious Creative, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

COPIOUS CREATIVE, INC., an Oregon
corporation,

Plaintiff,

vs.

PATRICK EZELL, an individual,

Defendant.

Case No. 3:16-cv-00427-BR

SUPPLEMENTAL DECLARATION OF
TIMOTHY HASKINS IN SUPPORT OF
PLAINTIFF COPIOUS CREATIVE, INC.'S
REPLY TO DEFENDANT'S RESPONSE TO
COPIOUS'S MOTION FOR TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE WHY PRELIMINARY
INJUNCTION SHOULD NOT ENTER AND
MEMORANDUM IN SUPPORT

I, Timothy Haskins, hereby declare as follows:

1. I am the President, sole director on the Board of Directors, and a shareholder in Copious Creative, Inc. ("Copious" or the "Company"), and have personal knowledge of the matters contained herein. I make this supplemental declaration in support of Plaintiff's Reply to

Defendant's Response to Copious's Motion for Temporary Restraining Order and Order to Show Cause Why Preliminary Injunction Should Not Enter and Memorandum in Support.

2. Attached hereto as Exhibit 1 is a true and correct copy of Copious's Security Guidelines, which are issued to all company employees. Exhibit 1 reflects that Mr. Ezell signed the Security Guidelines on October 1, 2012.

3. On March 12, 2016, I began the process of closing a company owned Dropbox account for David Hughes, a former Copious employee.

4. When I logged into Mr. Hughes' former company Dropbox account, I noticed that although the account had not been used for some time, Mr. Ezell still had shared access on some folders.

5. The folders were shared originally with Mr. Ezell's company Dropbox account associated with his former company email address, patrick@copiousinc.com. However, Mr. Ezell changed the email address associated with the Dropbox account to his personal email address, pezell@gmail.com, providing Mr. Ezell with access to the shared folder via his personal email address.

6. In addition, some of the folders shared between Mr. Hughes' former company Dropbox account and Mr. Ezell's Dropbox account reflect that as of March 12, 2016 they are "owned" by Mr. Ezell as they are associated with Mr. Ezell's personal email address, pezell@gmail.com, although they appear to contain company information.

7. Attached hereto as Exhibits 2 and 3 are true and accurate screenshots from Dropbox, dated March 12, 2016, reflecting Mr. Ezell's shared access to company folders on Dropbox and his ownership of some of those folders. Exhibit 2 also reflects that the email

address associated with Mr. Ezell's former company Dropbox account is now pezell@gmail.com, Mr. Ezell's personal email address.

8. Upon his termination, Mr. Ezell should have returned the company information contained in the Dropbox folders he is shown as the "owner" on, as well as the company information he had shared access to on Dropbox. He also should have returned his company Dropbox account – i.e., he should not have changed the email address associated with that Dropbox account to his personal email address.

9. Shannon Pasco is currently Copious's Creative Director.

10. On March 2, 2016, Ms. Pasco resigned from Copious. Ms. Pasco is still currently employed with Copious, however, with her last day scheduled for March 18, 2016.

11. Since the time of her resignation, Ms. Pasco has sought the release of one of Copious's clients, Leatherman, from a non-solicitation agreement wherein Leatherman agreed not to solicit Copious's employees.

12. Ms. Pasco has stated that if Copious were to release Leatherman from the non-solicitation agreement, there would be an opportunity for her to work with Mr. Ezell on that account.

13. Leatherman recently stated that it does not intend to move forward with a project it had previously committed to, as the two main company contacts associated with that project were David Hughes and Shannon Pasco.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED this 14 day of March, 2016.


Timothy Haskins

ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of **SUPPLEMENTAL DECLARATION OF TIMOTHY HASKINS** certified by me as such, on the parties below on the date and in the manner indicated:

Dayna J. Christian, OSB No. 97336
Jeffery Demland, OSB No. 140767
Immix Law Group PC
121 SW Salmon St., Suite 1000
Portland, Oregon 97204
Tel: (503) 802.5533
Fax: (503) 802.5351
E: dayna.christian@immixlaw.com
E: jeff.demland@immixlaw.com

Of Attorneys for Defendant Patrick Ezell

On March 14, 2016 by first class mail and email.

ZUPANCIC RATHBONE LAW GROUP, P.C.

/s/ Neil N. Olsen

Neil N. Olsen, OSB No. 053378

nolsen@zrlawgroup.com

Joseph W. Carlisle, OSB No. 152602

jcarlisle@zrlawgroup.com

Telephone: 503-968-8200

Facsimile: 503-968-8017

Of Attorneys for Plaintiff Copious Creative, Inc.

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